

Email From: David F. Gould, International Certification Services, Inc.

Subject: Comments on Docket Number TM-03-02

June 2, 2003

[Docket Number TM-03-02]

Dear People,

International Certification Services (ICS) is a USDA-accredited certifying agent under the National Organic Program (NOP). We wish to comment on the proposed amendments to the USDA National List of Allowed and Prohibited Substances (National List), as specified in Federal Register Docket Number TM-03-02.

To begin, we object to the impracticably short comment period allowed for these proposed NOP rule changes. We request that in the future all amendments to the NOP regulation 7 CFR Part 205 be subject to a minimum of a 30-day comment period. This notice was posted on May 22, 2003, which only allowed six working days for comment. Such a small window of opportunity to formulate and present serious comments on these important changes does not serve the public interest very well at all, nor does it reflect well on the transparency of or consumer confidence in the NOP and its rulemaking process. Many parties wishing to respond to these proposed changes face busy everyday schedules and thus will not be able to provide feedback to USDA to the degree they may have wanted, and this is certainly the case for ICS.

Nonetheless, we appreciate the opportunity to provide a brief commentary on our position to the proposed amendments, as follows:

Calcium sulfate -- mined:

ICS supports the addition of this material to the National List, as it is nonsynthetic and has been traditionally used in the manufacture of certain foods, most notably tofu.

Glucono delta-lactone:

We strongly suggest that this material only be included if it is accompanied by the restriction that it be produced via microbial fermentation of agricultural substances.

Animal Enzymes:

We support the inclusion of this material on the National List, as proposed.

Cellulose:

ICS does not support the addition of this material in any form or for any use to the National List. The material is synthetic and is not essential to any product formulation. There are a number of analogous materials already allowed under the NOP that can fulfill the role.

Potassium hydroxide:

We oppose the inclusion of potassium hydroxide to the National List for the purposes proposed. We do not agree that the material is essential to the peeling of peaches. The petitioner did illustrate some failed peach-peeling production trials without using the material, but these trials were far from exhaustive of the possibilities they could have employed to gain a

successful outcome. In fact, said trials seemed to be designed mainly to not have to cause any change to their status quo operations or cause any "inconvenience," and as such lacked creativity, or were simply designed to fail in order to prove their point.

Tetrasodium pyrophosphate:

We strongly oppose the addition of this synthetic material to the National List. TAP reviews against its inclusion adequately illustrate our opinion. To summarize, the material is synthetic, is not essential to any process, is use as a matter of processing convenience, and has no positive nutritional human effects. If anything, the effects on human nutrition may be negative.

Respectfully submitted,

International Certification Services, Inc.